

**UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT**

NATIONAL LABOR RELATIONS BOARD,

Petitioner,

vs.

Case Nos.: 12-1068
13-1169

ENJOI TRANSPORTATION, LLC
and PAULETTE HAMILTON,

Respondents.

National Labor Relations Board
William Mascioli
Assistant General Counsel
Helene Lerner
Polly Misra
Paul A. Thomas
1015 Half Street, SE
Washington, DC 20003
(202) 273-3788
(202) 273-4244 (fax)
paul.thomas@nrlrb.gov

I.A.B. Attorneys At Law, PLLC
Felicia Duncan Brock (P63352)
Attorneys for Respondents
25447 Plymouth Road
Redford, Michigan 48239
(313) 318-3180
(313) 766-4732 (fax)
Duncan@iabattorneys.com

**RESPONDENTS'
LIMITED RESPONSE TO PETITIONER
NATIONAL LABOR RELATIONS BOARD'S MOTION
FOR AN ORDER COMPELLING PRODUCTION OF DOCUMENTS**

NOW COME Respondents Enjoi Transportation, LLC and Paulette Hamilton, through their attorneys, I.A.B. Attorneys At Law, PLLC, and hereby responds to Petitioner National Labor Relations Board's Motion for an Order Compelling Production of Documents, as follows:

LIMITED RESPONSE

Respondents Enjoi Transportation, LLC and Paulette Hamilton admit that on or about December 14, 2018, Petitioner served Respondents with its First Request for Production of Documents. Respondents further admit that their responses to the Request for Production of Documents were due on or about January 14, 2019. At the time of Petitioner's filing of its Motion for an Order Compelling Production of Documents, March 8 2019, Respondents had not yet provided responses to Petitioner's Request for Production of Documents.

As explained to Petitioner and this Court previously, Respondents have faced extreme distress due to the loss of the business. In addition, because Respondents were forced to surrender its office space, some files could not be located. Nevertheless, on March 28, 2019, Respondents served Petitioner with objections and responses to the subject Request for Production of Documents via email. Further, attached to Respondents responses were 317 pages of responsive documents.

As such, Petitioner's Motion for an Order Compelling Production of Documents is moot. For this reason, the Motion should be denied; and no Order should be issued.

Respectfully submitted,

I.A.B. Attorneys At Law, PLLC

By: /s/ Felicia Duncan Brock

Felicia Duncan Brock (P63352)

Attorneys for Respondents

25447 Plymouth Road

Redford, Michigan 48239

(313) 318-3180

Dated March 29, 2019

CERTIFICATE OF SERVICE

I hereby certify that on March 29, 2019, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to the following Helene Lerner, Esquire, Polly Misra, Esquire and Paul A. Thomas, Esquire and I hereby certify that I have mailed by United States Postal Service the document to the following non ECF participants: n/a.

Respectfully submitted,

I.A.B. Attorneys At Law, PLLC

By: /s/ Felicia Duncan Brock

Felicia Duncan Brock (P63352)

Attorneys for Respondents

25447 Plymouth Road

Redford, Michigan 48239

(313) 318-3180

Dated March 29, 2019